

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

MISTY BLANCHETTE PORTER, M.D.,

Plaintiff,

vs.

DARTMOUTH-HITCHCOCK MEDICAL
CENTER, DARTMOUTH-HITCHCOCK
CLINIC, MARY HITCHCOCK
MEMORIAL HOSPITAL, and
DARTMOUTH-HITCHCOCK HEALTH,

Defendants.

Case No. 5:17-cv-194

**AFFIDAVIT OF DR. JOCELYN CHERTOFF IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT ON ALL CLAIMS**

Dr. Jocelyn Chertoff, under penalty of perjury, states and declares as follows:

1. I am currently employed by Dartmouth-Hitchcock Medical Center ("DHMC") as a Professor of Radiology and of Obstetrics and Gynecology, and I am the Chair of the Department of Radiology. I have held my position as Chair of the Department of Radiology since July 2015. I have personal knowledge of the matters set forth in this Affidavit and I could and would competently testify to those matters if called upon as a witness.

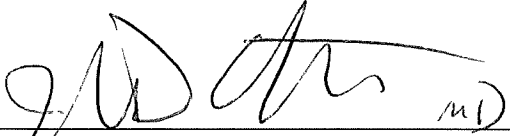
2. My responsibilities as Chair of the Department of Radiology include assessing the physician staffing needs of the Department and the needs of DHMC for radiology-related services, including ultrasounds. I am also responsible for approving the hiring of any physician into the Department of Radiology.

3. In 2017, the Department of Radiology did not have any need to hire or move a physician into the Department to perform or read only gynecologic and/or early obstetric ultrasounds, or any other small sub-segment of ultrasounds.

4. To my knowledge, the Department of Radiology has never hired or moved a physician into the Department to perform or read only gynecologic and/or early obstetric ultrasounds, or any other small sub-segment of ultrasounds.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27 day of January, 2020.



Dr. Jocelyn Chertoff

CERTIFICATE OF SERVICE

I hereby certify that, on January 29, 2020, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Tristram J. Coffin
Tristram J. Coffin